

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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*Counsel for Daryl Fred Heller, Chapter 11 Debtor
and Debtor-in-Possession*

In re:

DARYL FRED HELLER,

Debtor.

Case No. 25-11354 (JNP)

Chapter 11

**NOTICE OF CROSS-MOTION FOR AN ORDER GRANTING THE
DEBTOR AUTHORITY TO FILE THE MEMORANDUM OF LAW,
CERTIFICATION AND EXHIBITS UNDER SEAL IN OPPOSITION TO
PRESTIGE'S MOTION UNDER SEAL TO DETERMINE PRIVILEGE**

PLEASE TAKE NOTICE that on the **12th day of August 2025, at 11:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned counsel to Daryl Fred Heller, Chapter 11 debtor and debtor-in-possession (the "Debtor"), will cross-move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, United States Bankruptcy Court, 400 Cooper Street, Courtroom 4C, Camden, New Jersey 08101, for an order granting the Debtor authority to file the Memorandum of Law, Certification and Exhibits Under Seal (the "Cross-Motion to Seal") in opposition to Prestige's Motion Under Seal to Determine Privilege.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Cross-Motion to Seal shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Cross-Motion to Seal will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d), and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the legal bases for the relief requested are set forth in the Motion to Seal. A proposed Order granting the relief requested herein is also submitted herewith and made part of the Motion to Seal.

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

*Counsel for Daryl Fred Heller, Chapter 11
Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona
Sari B. Placona

Dated: August 5, 2025